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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF IOWA

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CLERK U.S. DISTRICT COURT
SOUTHERN DISTRICT OF IA

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

v.

KENT MERRILL ADAMSON,

CASE NUMBER: 4-07-MJ- 170

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief.

Between January 29, 2007 and July 26, 2007, in the Southern District of Iowa and elsewhere, the defendant did use a means of interstate commerce, specifically the internet by means of a computer, to entice a minor to engage in criminal sexual activities and to transfer obscene material to said minor, a person the defendant believed was a fourteen year old female

in violation of Title 18 United States Code, Section 2422 and 1470. I further state that I am a Special Agent with the Iowa Division of Criminal Investigation and that this Complaint is based on the following facts:

See attached Affidavit

Continued on the attached sheet and made a part hereof: Yes X No

Robert L. Larsen
DCI S/A Robert L. Larsen

Sworn to before me and subscribed in my presence,

October 9, 2007 at Des Moines, Iowa

Celeste F. Bremer
U.S. Magistrate Court Judge

Celeste F. Bremer
Name & Title of Judicial Officer

AFFIDAVIT

I, Robert L. Larsen, being duly sworn, depose and state:

1. I am a Special Agent (SA), with the Iowa Department of Public Safety, Division of Criminal Investigation (DCI), assigned to the Cyber Crime Unit in Council Bluffs, Iowa. I have been employed as a Special Agent for twelve years. As part of my daily duties as a DCI agent, I work with the Iowa Internet Crimes Against Children Task Force, and I investigate criminal violations relating to child exploitation. I have received training in the area of child exploitation and have had the opportunity to observe and review numerous examples of this type of crime. I have also participated in the execution of several search warrants, many of which have involved child exploitation offenses.

2. The purpose of this application is to arrest Kent Merrill ADAMSON, for violations of 18 U.S.C. § 2422, which among other things, makes it a crime to attempt to knowingly entice an individual who has not attained the age of 18 years to engage in sexual activity for which any person can be charged with a criminal offense, by using a means of interstate commerce, specifically via the Internet by means of a computer. This application also serves to arrest ADAMSON for violations of 18 U.S.C § 1470, which among other things, makes it a crime to knowingly transfer obscene material to another individual who has not attained the age of 16 years, knowing that the individual has not attained the age of 16 years, by using a means of interstate commerce, specifically via the Internet by means of a computer.

3. Because this Affidavit is being submitted for the limited purpose of securing an

arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only those facts that I believe are necessary to establish probable cause to believe that ADAMSON is in violation of 18 U.S.C. §§ 2422 and 1470. Where statements of others are set forth in this Affidavit, they are set forth in substance and in part.

4. As a result of the investigation described below, there is probable cause to believe that ADAMSON committed the violations of federal law, including 18 U.S.C. §§ 2422 and 1470, within the Southern District of Iowa.

5. The investigation has revealed that an individual subsequently identified as Kent Merrill ADAMSON, attempted to entice a female individual, who he believed was 14 years old, to meet him for the purpose of engaging in sexual activity. Furthermore, Adamson transferred obscene material to a female individual, who he believed was 14 years old, on nine separate occasions.

Details of Investigation

6. The information set forth below is provided as a broad overview of the investigation conducted to date. It does not include a listing of all investigative techniques employed or the full and complete results of any of the listed investigative efforts. Based on my knowledge and experience and on information received from other individuals, including Special Agent (SA) Jane Brillhart, Federal Bureau of Investigation,

Portland, Oregon, and other law enforcement officers as set forth below, I have learned the following:

(A) On 1/29/07, FBI Special Agent Jane Brillhart was working undercover and purporting to be a 14 year old female from the Portland, Oregon area.

Brillhart entered the Yahoo! chat room titled Romance, Adult, Fetish 15.

Brillhart entered this room using the screen name of "sassy_13_sarah". Shortly after entering this chat room, Brillhart was approached for conversation through the Yahoo Instant Messenger program by an individual with the screen name of "karson1812289". The individual identified himself as a 35 year old single dad of 3 kids living in Iowa.

(B) Between 1/29/07 and 7/26/07, "sassy_13_sarah" proceeded to have 23 chat conversations through Yahoo Instant Messenger with "karson1812289".

Nearly all of these chats involved "karson1812289" engaging in sexually oriented or sexually explicit conversation with "sassy_13_sarah". During chat conversations on 2/2/07, 3/12/07, 6/28/07, and 7/13/07, "karson1812289" specifically discussed meeting "sassy_13_sarah" for the purpose of having sex, and graphically described what he would do to her if they did meet.

(C) On seven occasions, while engaged in chat conversation, "karson1812289" invited "sassy_13_sarah" to view the video produced by his webcam. On 2/6/07, 3/12/07, 3/20/07, 6/18/07, 6/25/07, 6/28/07, and 7/26/07, "karson1812289" proceeded to masturbate while "sassy_13_sarah" viewed this activity. It should be noted that during the chat conversation on 3/12/07, "karson1812289" changed over to the screen name of "lillou11238" so

“sassy_13_sarah” could view his webcam. Also, on two other occasions, “karson1812289” shared a photo of an adult penis with “sassy_13_sarah” through Yahoo Instant Messenger. These photos were shared with “sassy_13_sarah” by “karson1812289” on 1/29/07 and 2/2/07.

(D) On 3/13/07, “karson1812289” provided his telephone number as 641-344-2898. FBI Special Agent Jane Brillhart subpoenaed the records of US Cellular, and was provided the profile information for the above-noted telephone number. The telephone number has the start service of 7/24/06, and is billed to Kent M. Adamson, with the address of 509 N. Birch Street in Creston, Iowa.

(E) On 3/14/07, “karson1812289” provided a webcam video of his face. Special Agent Brillhart obtained an Iowa driver’s license photo of Kent Merrill Adamson with an address of 509 N. Birch Street in Creston, Iowa. This photo of Adamson matches the face shown in the webcam video connected to the individual using the screen name of “karson1812289”.

(F) On 3/22/07, pursuant to a subpoena request, Special Agent Brillhart received information from Yahoo! that indicated the full name associated with the screen names of “karson1812289” and “lillou112388” was Mr. Kent K. Adamson, of Creston, Iowa. Yahoo! also provided the IP addresses associated with this account.

(G) Furthermore, during several instant message chats, “karson1812289” indicated he is a teacher and a coach. An internet search of the Creston Community School District revealed that Kent Adamson is a paraprofessional at Creston Middle School.

7. On 7/26/07, Federal Bureau of Investigation Special Agent David Larsen applied for, and obtained, a federal search warrant for the residence located at 509 North Birch Street in Creston, Iowa. The search warrant was signed by U.S. Magistrate Judge Ross Walters.

8. A federal search warrant was executed at the residence located at 509 North Birch Street in Creston, Iowa, by the Iowa Division of Criminal Investigation, the Federal Bureau of Investigation, and the Creston Police Department on 7/26/07. Three computers, various computer storage media, and other miscellaneous documents were seized as a result of the search.

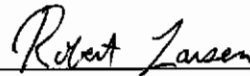
9. On 7/26/07, FBI Special Agent David Larsen and I interviewed Kent Adamson at the Creston Police Department. Adamson admitted to chatting with "sassy_13_sarah" and engaging in sexually explicit conversation with her. Adamson admitted to talking to "sassy_13_sarah" about meeting for the purpose of having sex, despite believing she was only 14 years old. Adamson claimed he had no intentions of actually meeting "sassy_13_sarah" and that it was all just "fantasy." Adamson further admitted to masturbating on webcam for "sassy_13_sarah" between 5 and 10 times, even though he believed she was only 14 years old.

10. On 8/1/07, I submitted the three computers and digital media that were obtained from executing the search warrant at the residence at 509 North Birch Street in

Creston, Iowa, to the Iowa Division of Criminal Investigation / Internet Crimes Against Children Task Force computer forensics laboratory in Ankeny. It should be noted that at this time, I have not received the results of the forensic examination.

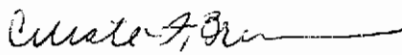
Conclusion

11. Based on the above information, there is probable cause to believe that Kent Merrill ADAMSON has violated 18 U.S.C. § 2422, which, makes it a federal crime for any person to attempt to knowingly entice an individual who has not attained the age of 18 years to engage in sexual activity for which any person can be charged with a criminal offense, by using a means of interstate commerce. Furthermore, there is probable cause to believe that Kent Merrill ADAMSON has violated 18 U.S.C. § 1470, which makes it a crime to knowingly transfer obscene matter to another individual who has not attained the age of 16 years, knowing that such other individual has not attained the age of 16 years, by using a means of interstate commerce



Robert L. Larsen
Special Agent
Iowa Department of Public Safety
Division of Criminal Investigation

Subscribed and sworn
before me this 9th of October 2007



United States Magistrate Judge
Southern District of Iowa
Des Moines, Iowa